

Proceeding: In the Matter of 1998 Biennial Regulatory Review -- Amendment of Part of the ☐ Record 1 of 1  
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I have been a licensed Amateur Radio operator for 41 years and have been employed in the field of radio communications for most of that time, both in military and civilian operational and technical positions. I am currently retired. I have served as Volunteer Examiner in the Amateur Radio Service for a period of about eight years and have held the Amateur Extra Class license since 1970.

1.) I am convinced that Morse code, while greatly reduced in its importance to communications worldwide, is still a viable and very useful mode of communication, particularly in the absence of more efficient types.

Since the Amateur Radio Service is the last remaining entity to utilize it in routine communications, I am convinced that it should be retained as a requirement for licensing at High Frequencies as currently required by international treaty so that a pool of trained code operators will exist. If this pool does not exist within amateur radio, it will not exist anywhere.

It is entirely appropriate to reduce the skill requirement to 5 words per minute for the General class license and 12 words per minute for the Advanced class to conform with CEPT requirements.. To encourage those amateur operators who wish to advance their code skills, the Extra class license should retain the 20 words per minute level exam.

Accordingly, additional exclusive privileges afforded the Extra class licensees should be limited to the lower 25 kHz of each amateur band digital segment, excepting the bands at 10, 17 and 24 MHz, as current regulations provide..

The Advanced class should be granted all other privileges now held by the Extra class.

The General class should be granted code privileges equal to Advanced, and equal privileges in voice segments except for the lowest 50 kHz of each voice segment.

2.) The Novice and Technician Plus licenses should be discontinued and current licensees of these classes upgraded to General, either by passing the appropriate written test element or by FCC administrative action since the code qualification has been met..

The band segments now authorized to Novice and Tech Plus for Morse code should revert to use by the digital modes. There is a growing segment of the Amateur Radio service which is working on development of advanced digital communications modes. These modes are certain to require this band space, and more as time advances.

3.) I am convinced that no effective enforcement is possible without the direct involvement of the FCC through an active enforcement arm, funded by license fees paid by amateur radio operators. It would not be required to be a large entity, just active. The very existence of such an active enforcement branch does very much to forestall the type of activity that becomes prevalent when perpetrators know that no real enforcement mechanism exists. Active teams in the field are required.

I believe the Commission should request Congress to legislate law that mandates that the cost of enforcement should be borne by licensees of the Amateur Radio service, with license fees collected going directly to the FCC enforcement branch instead of to other FCC expenses or to general revenue. These fees could be waived for underage applicants or those documenting hardship. This enforcement branch should have authority over the Citizens Radio Service and any associated illegal out-of-band activities. The law should provide for substantially larger fines for these violators, and confiscation of associated illegal equipment to be sold (as scrap when appropriate) the proceeds of which also is to be used to fund this enforcement, in the absence of Citizens Band licensing fees.

4.) As a longtime volunteer examiner I am well aware of the faults and weaknesses of the Question Pool exams with the exact answers given on the study syllabus. Those answers are even in the same order on the exams as they were on the question pools. It is much too easy to pass any amateur exam without the proper learning taking place.

No institution of learning at any level could employ such a method. The graduated product of such a system would soon cause the loss of confidence in the cirrocumuli by failure of graduates to perform, and that is the case in Amateur Radio today. Under the present system many applicants who achieve the top level of licensing exhibit little or no knowledge of the material on which they were tested.

There has to be a better way. I urge the Commission to order the Volunteer Examiner Coordinators to find a more appropriate method of testing that would better reflect knowledge instead of memorization of word associations necessary to pass written exams.

5.) The Disability Waivers of code speeds could be improved by adding a block for the physician to state the nature of the disability, with a waiver of privacy by the applicant. The fact that only the doctor's signature is presently required makes it seem less important than if the doctor was required to state a diagnosis. It is easy to simply forge a doctors signature since no investigation is done by anyone in the licensing system. The added detailed disability information would serve to make this a less attractive

option. The applicant's privacy would be protected by strict limiting of access to the information to those directly involved within the Volunteer Examiner system.

Also, the incidence of disabled persons requesting a waiver should be sharply reduced by the change in the code test requirements of the various license classes since 5wpm code proficiency is required is required by international treaty..